

Mel C. Orchard, III  
Meyer and Williams,  
Attorneys at Law, P.C.  
P.O. Box 2608  
Jackson, WY 83001  
307/733-8300

Craig E. Kirkwood  
Kirkwood, Nelson & Vang, P.C.  
P.O. Box 1165  
Laramie, WY 82073-1165  
307/742-8151

Attorneys for Plaintiffs

FILED  
DISTRICT OF WYOMING  
CLERK  
JUN 19 2000  
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

MERLE M HALL and RAY HALL,  
Plaintiffs,

vs.

POLTRANS, INCORPORATED,  
a California corporation; IGOR  
ABRAMENKO; JOHN DOES I-V; and  
DOE CORPORATIONS I-V  
Defendants.

Case No. 00CV 005 D

**PLAINTIFFS' DESIGNATION OF EXPERT WITNESSES**

COME NOW the plaintiffs, and pursuant to the scheduling order of this Court, and U.S.D.C.L.R. 26(g), hereby designate the following expert witnesses who may testify at the trial of this case:

The following apply to all expert witnesses listed herein:

1. All opinions of expert witnesses set forth herein are to a reasonable degree of probability in the witness's field of expertise.

2. All material and information relied upon by expert witnesses in forming opinions is of the type ordinarily and reasonably relied upon by experts in the field of such witnesses in forming such opinions.
3. The contents of depositions of each witness, if any, are incorporated in the witness designation for each witness.

**John Smith**  
**Raymond P. Smith & Associates**  
**1880 East 84<sup>th</sup> Avenue**  
**Denver, CO 80229**  
**303/288-3015**

John Smith is an accident reconstruction expert whose credentials are listed in a CV, which is attached hereto. Mr. Smith associates with Peter Alexander in forming his opinions. Mr. Smith, however, is the person who will testify, if called, as an expert for the purposes of the case at bar. Mr. Smith has listed the cases and depositions he has been involved with for the past five years. He has also provided his hourly charge for deposition and trial testimony. His opinion is contained generally in the report attached hereto. He will testify generally and specifically regarding liability and causation. Mr. Smith's opinion is that Mr. Abramenko was traveling too fast for conditions, was following too closely and/or was taking unnecessary risks in reckless disregard of the consequences of his actions. Mr. Abramenko's conduct was a substantial factor in causing the wreck in question. Moreover, Mr. Abramenko's conduct was in large part, the cause of the wreck in question. The report attached hereto outlines these opinions in more detail. The plaintiff reserves the right to supplement this designation as discovery progresses, and to the extent the defendant hires an expert who conducts additional testing or provides opinions regarding evidence not considered by Mr. Smith.

**Erin Bigler, Ph.D**  
**Board Certified Nueropsychologist**  
**P.O. Box 1968**  
**Provo, Utah 84603-1968**

Dr. Bigler is a Nueropsychologist who may be called to testify regarding testing that may be necessary to better determine Merle Hall's current level of cognitive functioning. It is anticipated Dr. Bigler will rely in part on the nueropsychological report prepared by Norma Cooke, Ph.D as well

as his own testing, and other medical records. It is anticipated that Dr. Biger will perform testing on the plaintiff, Merle Hall, during the next two months. The Plaintiff will supplement this designation with Dr. Bigler's testing results, opinion, CV, list of trial and deposition testimony and fee schedule.

**TREATING HEALTH CARE PROVIDERS**

**Raymond R. Price, M.D.**  
**LDS Hospital**  
**8<sup>th</sup> Avenue & C Street**  
**Salt Lake City, UT 84143**  
**801/321-1791**

Dr. Price is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. He is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Price will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Price has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Price will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Charles Sorensen, M.D.**  
**LDS Hospital**  
**8<sup>th</sup> Avenue & C Street**  
**Salt Lake City, UT 84143**  
**801/321-1791**

Dr. Sorensen is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. He is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills

were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Sorsensen will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Sorsensen has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Sorsensen will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Gregory R. Dunnivant, M.D.**  
**LDS Hospital**  
**8<sup>th</sup> Avenue & C Street**  
**Salt Lake City, UT 84143**  
**801/321-1791**

Dr. Dunnivant is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. He is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Dunnivant will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Dunnivant has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Dunnivant will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Nathan C. Dean, M.D.**  
**LDS Hospital**  
**8<sup>th</sup> Avenue & C Street**  
**Salt Lake City, UT 84143**  
**801/321-1791**

Dr. Dean is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Dean is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Dean will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Dean has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Dean will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Norma Cooke, Ph.D**  
**Baylor College of Medicine**  
**One Baylor Plaza**  
**Houston, Texas 77030-3498**

Dr. Cooke is a Neuropsychologist who treated Mrs. Hall and is expected to testify in accordance with her medical records and the reports she completed, which have been provided to the defendant and are incorporated herein by this reference. Dr. Cooke is expected to testify additionally about Mrs. Hall's traumatic brain injury and the long term effects of such an injury including, but not limited to, cognitive dysfunction, memory loss, executive function problems, and other disorders associated with traumatic brain injury. Dr. Cooke will testify that Mrs. Hall's injury was caused by the wreck in question. Mrs. Hall's disability caused by the wreck in question will become more prominent or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Her injuries and current deficits are permanent in nature. Dr. Cooke will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Peter S. Hanson, M.D.**  
**LDS Hospital**  
**8<sup>th</sup> Avenue & C Street**  
**Salt Lake City, UT 84143**  
**801/321-1791**

Dr. Hanson is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Hanson is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Hanson will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Hanson has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Hanson will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**James W. Morrison, M.D.**  
**LDS Hospital**  
**8<sup>th</sup> Avenue & C Street**  
**Salt Lake City, UT 84143**  
**801/321-1791**

Dr. Morrison is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Morrison is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Morrison will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Morrison has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Morrison will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Greg R. Goodman, M.D.**  
**LDS Hospital**

**8<sup>th</sup> Avenue & C Street  
Salt Lake City, UT 84143  
801/321-1791**

Dr. Goodman is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Goodman is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Goodman will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Goodman has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Goodman will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Mark N. Critchfield, M.D.  
LDS Hospital  
8<sup>th</sup> Avenue & C Street  
Salt Lake City, UT 84143  
801/321-1791**

Dr. Critchfield is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Critchfield is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Critchfield will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Critchfield has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Critchfield will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Charles Ford, M.D.**  
**LDS Hospital**  
**8<sup>th</sup> Avenue & C Street**  
**Salt Lake City, UT 84143**  
**801/321-1791**

Dr. Ford is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Ford is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Ford will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Ford has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Ford will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Jeffrey A. Kozak, M.D., P.A.**  
**7401 South Main**  
**Houston, TX 77030**  
**713/799-2300**

Dr. Kozak is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Kozak is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Kozak will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Kozak has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Kozak will provide a



CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Jeffrey A. Jackson, M.D.**  
**Jackson and Jones Neurology**  
**7505 South Main, Suite 150**  
**Houston, TX 77030**

Dr. Jackson is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Jackson is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Jackson will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Additionally, Dr. Jackson believes that although Mrs. Hall suffered from some preexisting pain in her neck and low back, she was asymptomatic for pain before the wreck. Therefore, the exacerbation of these preexisting conditions, and the resulting pain and disability was caused solely by the wreck. Her condition was caused not by the preexisting condition but instead by the forces exerted on her body by the wreck. Because Dr. Jackson has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Jackson will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Larry L. Patchell, M.D.**  
**Shamrock Imaging**  
**7311 South Main Street**  
**Houston, TX 77030**  
**713/796-9912**

Dr. Patchell is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Patchell is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Patchell will testify that the symptoms Mrs. Hall is currently suffering

from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Patchell has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Patchell will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Nicholas Sollenne, III, M.D.**  
**Medical Clinic of Houston, LLP**  
**1707 Sunset Blvd.**  
**Houston, TX 77005**

Dr. Sollenne is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Sollenne is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Sollenne will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Sollenne has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Sollenne will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Michael Winkelmann, M.D.**  
**Institute of Physical Medicine**  
**1 Layfair Drive, Suite 100**  
**Jackson, MS 39208**

Dr. Winkelmann is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Winkelmann is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following

the wreck. Dr. Winkelmann will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Winkelmann has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Winkelmann will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Stephanie Lynchard, OTR**  
**MMRC**  
**1 Layfair Drive**  
**Jackson, MS 39208**

Ms. Lynchard is a healthcare provider of plaintiff Merle Hall. She is expected to testify in accordance with her medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Ms. Lynchard is also expected to testify about Merle Hall's injuries generally and specifically. She will offer opinions that her injuries were caused by the incident in question. She will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Ms. Lynchard will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Ms. Lynchard has not been specifically retained as an expert witness, but is an expert simply because she medically treated the plaintiff, that information is not provided herein. Ms. Lynchard will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Jim Fehrenbacher, P.T.**  
**MMRC**  
**1 Layfair Drive**  
**Jackson, MS 39208**

Jim Fehrenbacher is a physical therapist of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Mr. Fehrenbacher is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment

rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Mr. Fehrenbacher will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Mr. Fehrenbacher has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Mr. Fehrenbacher will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**Teresa A. Atkinson, P.T.  
Atkinson Manual Physical Therapy, P.C.  
4615 Post Oak Place, Suite 190  
Houston, TX 77027  
713/621-7717**

Teresa Atkinson is a physical therapist of plaintiff Merle Hall and is expected to testify in accordance with her medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Ms. Atkinson is also expected to testify about Merle Hall's injuries generally and specifically. She will offer opinions that her injuries were caused by the incident in question. She will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Ms. Atkinson will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Ms. Atkinson has not been specifically retained as an expert witness, but is an expert simply because she medically treated the plaintiff, that information is not provided herein. Ms. Atkinson will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**John Iliya, M.D.  
Memorial Hospital of Sweetwater County  
Rock Springs, WY**

Dr. Iliya is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Iliya is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical

bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Iliya will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Iliya has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Iliya will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

**William R. Compton, M.D.**  
**Memorial Hospital of Sweetwater County**  
**Rock Springs, WY**

Dr. Compton is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with his medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Dr. Compton is also expected to testify about Merle Hall's injuries generally and specifically. He will offer opinions that her injuries were caused by the incident in question. He will testify that her medical bills were reasonable in amount and the medical treatment rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Dr. Compton will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Dr. Compton has not been specifically retained as an expert witness, but is an expert simply because he medically treated the plaintiff, that information is not provided herein. Dr. Compton will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

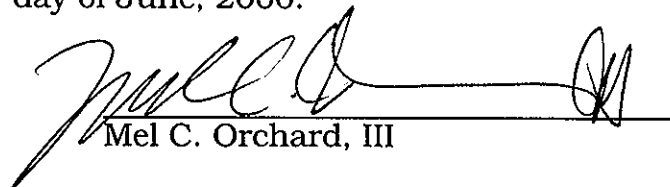
**Anne Newton P.T.**  
**MMRC Outpatient Rehabilitation**  
**One Layfair Drive**  
**Jackson, Ms 39208**

Anne Newton is a treating physician of plaintiff Merle Hall and is expected to testify in accordance with her medical records, which have been provided to the defendants and are hereby incorporated herein by this reference. Ms. Newton is also expected to testify about Merle Hall's injuries generally and specifically. She will offer opinions that her injuries were caused by the incident in question. She will testify that her medical bills were reasonable in amount and the medical treatment

rendered was reasonably necessary given Mrs. Hall's condition following the wreck. Ms. Newton will testify that the symptoms Mrs. Hall is currently suffering from are permanent in nature and are likely to continue into the future. Mrs. Hall's disability caused by the wreck in question will become more prominent, or more disabling as she ages. Indeed, Mrs. Hall will age more quickly because of her injuries than would someone who had not been involved in a wreck of the magnitude of the wreck in question. Because Ms. Newton has not been specifically retained as an expert witness, but is an expert simply because she medically treated the plaintiff, that information is not provided herein. Ms. Newton will provide a CV, list of cases, and fee for deposition and trial testimony if requested by the defendant.

The plaintiff reserves the right to amend this designation in the event the defendant lists a witness with a specialty not listed in Plaintiff's designation, or, in the event Jolene Crawford's care and treatment requires a health care provider not listed herein. Moreover, Plaintiff reserves the right to supplement this designation with witnesses who are listed in Plaintiff's medical records, who may be called to offer testimony or to provide foundation for the medical records and bills which have been, or that will be, produced.

DATED: This 15<sup>th</sup> day of June, 2000.

  
Mel C. Orchard, III

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of June, 2000, a true and accurate copy of the foregoing was placed in the U.S. mail, postage prepaid and/or sent by telefax as indicated below and addressed to:

Curtis B. Buchhammer  
Buchhammer & Kehl, P.C.  
1821 Logan Avenue  
P.O. Box 568  
Cheyenne, WY 82003-0568

U.S. mail only: \_\_\_\_\_

Telefax only: \_\_\_\_\_

U.S. mail and telefax: ☒ \_\_\_\_\_

Craig E. Kirkwood  
Kirkwood, Nelson & Vang, P.C.  
P.O. Box 1165  
Laramie, WY 82073-1165

U.S. mail only: ☒ \_\_\_\_\_


Telefax only: \_\_\_\_\_

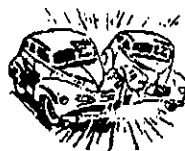
U.S. mail and telefax: \_\_\_\_\_

Telefax numbers, if utilized:

Buchhammer & Kehl, P.C., 307/634-2199

Kirkwood, Nelson & Vang, P.C., 307/742-9208

  
\_\_\_\_\_  
Mel C. Orchard, III



## Raymond P. Smith & Associates

TECHNICAL ACCIDENT INVESTIGATION • ACCIDENT RECONSTRUCTION  
MEMBER **SAE** The Engineering Society for Advancing Mobility

June 15, 2000

RAYMOND P. SMITH  
ACCIDENT  
RECONSTRUCTIONIST

JOHN J. SMITH, PE.  
B.S.G.P., M.S.E.E.

PETER ALEXANDER  
Ph.D., PHYSICS

C. SAMEUL MILLER  
Ph.D., PE

DONALD S. MASSEY  
D.O., FACOEP

THOMAS LINDQUIST  
LAMPS ON/OFF  
RETIRED CPT., C.S.P.

THERESA A. SMITH, M.B.A.  
B.S.N.

FRANCIS J. SMITH  
B.S.G.P., M.S.E.E.

IRIS T. ALEXANDER  
B.S., M.S., PHYSIOLOGY

RALPH D. GRAHAM  
SAFETY CONSULTANT  
TRANSPORTATION

JONATHAN SHARP  
CERTIFIED  
SAFETY PROFESSIONAL

JAMES T. HOGAN  
INVESTIGATOR

RUDOLPH RIEHL  
MECHANICAL  
TECHNICIAN

ROBIN ALEXANDER  
RESEARCH ASSISTANT

BILL OLIVER  
FIELD INVESTIGATOR

JOHN CASTERDALE  
ANIMATION

Meyer & Williams  
Attorneys At Law  
P.O. Box 2608  
350 East Broadway  
Jackson, Wyoming 83001

Attn: Mr. Mel Orchard

Re: Collision January 25, 1996 at 1125 hours  
I-80, 0.1 Miles West of Milepost 89  
Sweetwater County, Wyoming  
Hall, Abramenko

Subject: Preliminary Report

Dear Mr. Orchard,

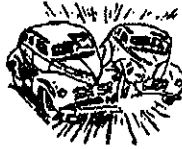
The State of Wyoming Investigator's Traffic Accident Report and associated documents for the referenced collision were studied. Color photographs of the collision scene were examined, as were color photographs of the Hall vehicle. The Hall vehicle was examined and photographed. The repair estimate from Crawford & Company was reviewed. The deposition of Anna Depta and the recorded statement of Ray Hall were read, as were the deposition and statement of Igor Abramenko. A letter from the Department of Transportation dated November 25, 1996 was considered. Correspondence from Harco Insurance Company and Farmers Insurance Group was reviewed. Based upon this data, the referenced collision was reconstructed.

The following facts were considered:

1. The Hall vehicle, a 1996 Lexus LS400, was reported to be eastbound in the right lane of I-80.
2. The Abramenko vehicle, a 1995 Freightliner semi, was reported to be eastbound in the passing lane of I-80 behind the Hall vehicle.
3. The Accident Report indicated that Mr. Hall lost control of his vehicle and fishtailed in front of the Abramenko truck.
4. The Accident Report indicates that the Abramenko vehicle collided with the Hall vehicle and then struck the guardrail.

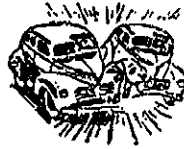
1880 E. 84th Avenue • Denver, Colorado 80229  
(303) 288-3015 • (800) 237-6001 • (303) 288-6544 Fax





June 15, 2000  
Hall, Abramenko  
Page 2

5. The Hall vehicle came to rest in the median on the north side of the road. The Abramenko vehicle came to a stop against the guardrail on the south side of the road.
6. The investigating officer reported that after impact, the Hall vehicle traveled approximately 115 feet to rest.
7. The Accident Report depicted heavy damage to the area of the right side passenger door of the Hall vehicle.
8. The Accident Report depicted damage to the left and right front end of the Abramenko vehicle.
9. The Accident Report listed the speed of the Abramenko vehicle as 45 to 50 m.p.h., and the speed of the Hall vehicle as 50 m.p.h.
10. The speed limit at this location was reported to be 75 m.p.h.
11. The Accident Report estimated the repair cost of the Hall vehicle at \$10,000, and the repair cost of the Abramenko vehicle at \$2,500.
12. The road at the site of the collision was reported to be icy, straight and upgrade. The Accident Report indicates it was snowing.
13. All parties were reported to be restrained.
14. Mrs. Hall, the left front passenger in the Hall vehicle, was reported to have evident incapacitating injuries.
15. The photographs of the Hall vehicle show the right side to be pushed inward and the front passenger seat is deformed. The right front door is missing. The damage extends forward to the right front fender, rearward to the right rear fender, and upward to just below the roof near the rear window. The hood is buckled on the right side. The windshield is damaged. The Hall vehicle was declared a total loss.
16. The photographs of the scene show that the roadway is paved and generally straight.
17. In the Owner's Traffic Accident Report, Mr. Hall reported that he was driving east on I-80 at 45 m.p.h. Mr. Hall indicated that he saw black ice on the road ahead and slowed to 35 m.p.h. Mr. Hall indicated that he lost control of his vehicle and an 18-wheeler crashed into his wife's door. The diagram accompanying Mr. Hall's statement indicates the collision occurred in the right lane with the Hall vehicle angled to face the guardrail.



June 15, 2000  
Hall, Abramenko  
Page 3

18. In his recorded statement, Mr. Hall indicated that he was driving east on I-80 in the right lane at an estimated speed of approximately 45 m.p.h. Mr. Hall related that there was black ice on the road and it was not snowing at the time of the collision. Mr. Hall indicated that he slowed when he observed the icy road conditions. Mr. Hall reported that he had left Evanston, Wyoming at 9 in the morning and had driven about 84 miles, when he saw black ice in his lane. Mr. Hall stated that as he encountered the ice, he lost control, was weaving across the road, and was crossways in the road when the truck struck his vehicle. As a result of the collision, Mr. Hall said the entire right side of his vehicle was smashed. Mr. Hall indicated that the 18-wheeler also suffered damage to the front end.
19. Mr. Igor Abramenko stated in his deposition of May 11, 2000, that he was carrying a load of apples and peaches in a Freightliner 18 wheeler semi and refrigerated trailer. Mr. Abramenko stated that his vehicle was loaded to within a couple thousand pounds of 80,000. Mr. Abramenko stated that he is pretty sure that the weight was legal because they had just checked the weight at the scales when he entered Wyoming. Mr. Abramenko stated that he was following 100 to 200 meters behind another truck driver in the left lane and talking with him on the CB radio. Mr. Abramenko stated that it was very cold and the road conditions were icy but there was good visibility. Mr. Abramenko estimated his speed at between 40 and 50 m.p.h. Mr. Abramenko related that on an upgrade, a car in the right lane, traveling at the same speed as the truck, started to slide from side to side, and moved in front of the Abramenko semi. Mr. Abramenko could not estimate when he had first observed the car in the right lane. Mr. Abramenko stated that he could not stop his heavy truck on the ice so he tried to change lanes and slow down to move away from the car. Mr. Abramenko said he did not downshift or brake his vehicle. Mr. Abramenko said he changed lanes whenever the car moved into his lane, which happened three times. Mr. Abramenko stated that there was snow in the median where they were clearing the interstate. Mr. Abramenko said he was in the right lane when the car moved in front of him from the median, like it was driving across the street. Mr. Abramenko said he tried to move to the right shoulder toward the guardrail. Mr. Abramenko stated that the front left of his truck struck the passenger side of the car. After the collision, Mr. Abramenko said he got out of his truck, but people had already stopped to help. Mr. Abramenko stated that someone came to him and asked for a



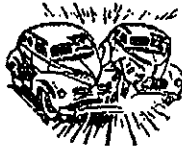
June 15, 2000  
Hall, Abramenko  
Page 4

blanket for the woman in the car because the vehicle's window was broken and they could not get her out of the car. Mr. Abramenko stated that he broke his hand and was taken to the hospital by ambulance along with the occupants of the car. Mr. Abramenko stated that he never spoke to the occupants of the other vehicle or examined his truck after the collision. Mr. Abramenko stated that the police officer told him that the other driver was issued a citation and that he has never been in any other accidents.

20. In a statement, apparently taken by Ms. Depta, Mr. Igor Abramenko reported that he was driving east on I-80 at 40 m.p.h. Mr. Abramenko indicated there was a truck about 150 yards ahead of him that passed the Hall vehicle. Mr. Abramenko said he was setting up to pass when Mr. Hall lost control and swerved into the left lane. Mr. Abramenko indicated he down shifted his truck and braked, while moving into the right lane, to avoid the Hall vehicle. According to Mr. Abramenko, Mr. Hall then swerved back into the right lane where the impact occurred.
21. Ms. Anna Depta stated in her May 11, 2000 deposition that Mr. Abramenko's file was destroyed three years after he left employment with Poltrans and that she had helped him fill out many of the forms because of his difficulty with the English language.

The following conclusions were reached:

1. Mr. Hall's contention that his average speed from when he left Evanston was 45 m.p.h. or less is supported by the physical evidence.
2. With gentle braking, Mr. Hall could have slowed from 45 m.p.h. to the 35 m.p.h. in approximately 2 seconds.
3. The Abramenko truck speed, at impact, was approximately 35 m.p.h. faster than the Hall vehicle's speed.
4. The Hall vehicle achieved a post impact change in speed of approximately 35 to 45 m.p.h.
5. Mr. Abramenko reported that he was traveling at 45 m.p.h. and was approximately 150 yards behind the Hall vehicle when it lost control. With gentle braking Mr. Abramenko should have been able to bring his truck to a complete stop before reaching the Hall vehicle. Mr. Abramenko would have had more than 450 feet available for braking, since the Hall vehicle continued to move eastward down the road during the sliding maneuvers.



June 15, 2000  
Hall, Abramenko  
Page 5

6. It was reported that Mr. Abramenko said he had decided to pass the Hall vehicle. If this is true, this would be a reckless act.
7. If Mr. Abramenko had sufficient time to change lanes repeatedly, there was sufficient time for him to avoid the collision by slowing.
8. Mr. Abramenko appears to have been driving in a careless manner. Either he was traveling too fast and/or following too closely for the road conditions and was unable to stop in response to an emergency situation in the road ahead of him. Additionally, Mr. Abramenko may have made a bad decision to pass an out of control vehicle on the road ahead, in the face of icy road conditions.

Based upon our education, experience and the above stated facts, it is our opinion that the collision with the Hall vehicle was in large part the result of the speed and proximity of the Abramenko vehicle. In addition, Mr. Abramenko made a series of poor decisions in not coming to a stop prior to the collision, despite the icy road conditions.

Sincerely,

  
Peter Alexander

  
John J. Smith

**Raymond P. Smith & Associates**
 TECHNICAL ACCIDENT INVESTIGATION • ACCIDENT RECONSTRUCTION  
 MEMBER **SAE**

 RAYMOND P. SMITH  
 ACCIDENT  
 RECONSTRUCTIONIST

 •  
 JOHN J. SMITH, P.E.  
 B.S.G.P., M.S.E.E.

 •  
 C. SAMEUL MILLER  
 Ph.D., PE

 •  
 DONALD S. MASSEY  
 D.O., FACOE

 •  
 THOMAS LINDQUIST  
 LAMPS ON/OFF  
 RETIRED CPT., C.S.P.

 •  
 THERESA A. SMITH  
 B.S.N.

 •  
 FRANCIS J. SMITH  
 B.S.G.P., M.S.E.E.

 •  
 RALPH D. GRAHAM  
 SAFETY CONSULTANT  
 TRANSPORTATION

 •  
 JONATHAN SHARP  
 CERTIFIED  
 SAFETY PROFESSIONAL

 •  
 JAMES T. HOGAN  
 INVESTIGATOR

 •  
 RUDOLPH RIEHL  
 MECHANICAL  
 TECHNICIAN

 •  
 ROBIN ALEXANDER  
 RESEARCH ASSISTANT

 •  
 BILL OLIVER  
 FIELD INVESTIGATOR
**PETER ALEXANDER Ph.D.**

Dr. Alexander has a strong Physics, Engineering, and Numerical Modeling background. He has a Ph.D. in Physics and has served as Research or Engineering Director at Foxboro Corp., Combustion Engineering, Schlumberger, TRW, and Bendix Corp. He has held positions in the Government, Academia, and Industry in which he managed large and small projects involving multidisciplinary groups of physicists and engineers. He currently serves as a Staff Physicist at Raymond P. Smith & Associates.

**EDUCATION:**

Mass. Institute of Technology	1956	B.S. Physics
Purdue University	1961	Ph.D. Nuclear Physics & Math
Calif. Institute of Technology	1961-64	Physics Faculty, Research Fellow

**REPORTS, PUBLICATIONS, PATENTS:**

Over 60

**BROAD MULTIDISCIPLINARY TECHNICAL BACKGROUND**

Dr. Alexander has a broad multidisciplinary background which spans physics, mechanical systems design, microelectronics, materials properties, numerical modeling, sensor technology, process measurement & control, environmental technology, compositional analysis, and geophysical technology.

**EXPERTISE IN PHYSICS**

Dr. Alexander has a strong Physics background including degrees in Physics from M.I.T. and Purdue University. He also served on the Physics Faculty at the California Institute of Technology where he worked directly with a number of Nobel Prize winning physicists.

**NUMERICAL MODELING**

Dr. Alexander has developed a number of numerical models involving the application of forces, geophysical phenomena, nuclear fields, and mathematical relationships. He has also validated numerical models and related the predictions of these models to "real life" situations.



Peter Alexander  
Page 2

### **MECHANICAL STRUCTURES AND MATERIALS PROPERTIES**

Dr. Alexander has managed programs involving the design of complex mechanical structures meant to safely withstand high stress and unusual forces during operation.

- Dr. Alexander managed the Schlumberger high pressure test facility in Houston where mechanical designs and various materials were subjected to high pressures and temperatures to evaluate their performance.
- Dr. Alexander served as Senior Program Manager for Raytheon Engineers where he worked on programs involving the design of facilities and structures, to house and process nuclear and hazardous operations, that would be able to withstand high g forces.
- Dr. Alexander has evaluated the performance of various materials under adverse mechanical and chemical conditions.

### **MULTIDISCIPLINARY ENGINEERING PROGRAM MANAGEMENT**

Dr. Alexander has organized, staffed, budgeted and managed over 100 multidisciplinary engineering projects. As a Research, Engineering, and Product Line Manager at Combustion Engineering and Foxboro Co., Dr. Alexander designed and tested mechanical and electronic systems used in harsh environments. He managed multidisciplinary groups of mechanical, electrical, and computer engineers. As Engineering Director at Schlumberger he built and managed a world class organization of 80 geophysicists, petroleum engineers, computer modelers, mechanical engineers, electrical engineers, and field service people. Many of these individuals were Professional Engineers. At TRW he was responsible for managing a multidisciplinary staff of Engineers working on a field demonstration program in Wyoming.

### **MICROSENSORS AND MICROELECTRONICS**

Dr. Alexander has a broad sensor background which includes development of supporting microelectronics. He has developed sensor technology of many varieties including process measurement and control sensors, environmental sensors, chemical process system sensors, electro-optical sensors, automotive sensors, and natural resources/geophysical sensors.



Peter Alexander  
Page 3

**POSITIONS HELD:**

<b><u>ORGANIZATION</u></b>	<b><u>POSITION</u></b>	<b><u>DATE</u></b>
Raymond P. Smith & Associates Denver, Colorado	Staff Physicist	1998- Present
Various Clients 1998	Consultant	1997-
Raytheon Engineers Denver, Colorado	Senior Program Manager	1993-1997
EG&G Waltham, Massachusetts	Senior Scientist	1992-1993
Foxboro Corp. Foxboro, Massachusetts	Director Pressure Products Director Microtechnology Products	1990-1992
Combustion Engineering Inc. Rochester, New York	Director Measurement R&D Senior Principal Engineer	1986-1990
Flopetrol Johnston Div. of Schlumberger Inc., Houston, Texas	Director of Research & Engineering	1983-1986
TRW Inc. Colorado & Virginia	Manager - Instrumentation Application Office	1977-1983
Bendix Field Engineering Corp. Grand Junction, Colorado	Director Advanced Technology Division	1974-1977



John J. Smith, P.E.

**Raymond P. Smith & Associates**

TECHNICAL ACCIDENT INVESTIGATION • ACCIDENT RECONSTRUCTION

MEMBER **SAE** The Engineering Society for Advancing Mobility**Experience:****12/91 - Present****Staff Engineer,****Raymond P. Smith and Associates – Denver, Colorado**

- Accident Investigation and Reconstruction
- Occupant Kinematics/Injury Mechanisms
- Biomechanics

RAYMOND P. SMITH  
ACCIDENT  
RECONSTRUCTIONIST

•  
JOHN J. SMITH, PE.  
B.S.G.R., M.S.E.E.

•  
PETER ALEXANDER  
Ph.D., PHYSICS

•  
C. SAMEUL MILLER  
Ph.D., PE

•  
DONALD S. MASSEY  
D.O., FACOEP

•  
THOMAS LINDQUIST  
LAMPS ON/OFF  
RETIRED CPT., C.S.P.

•  
THERESA A. SMITH, M.B.A.  
B.S.N.

•  
FRANCIS J. SMITH  
B.S.G.R., M.S.E.E.

•  
IRIS T. ALEXANDER  
B.S., M.S., PHYSIOLOGY

•  
RALPH D. GRAHAM  
SAFETY CONSULTANT  
TRANSPORTATION

•  
JONATHAN SHARP  
CERTIFIED  
SAFETY PROFESSIONAL

•  
JAMES T. HOGAN  
INVESTIGATOR

•  
RUDOLPH RIEHL  
MECHANICAL  
TECHNICIAN

•  
ROBIN ALEXANDER  
RESEARCH ASSISTANT

•  
BILL OLIVER  
FIELD INVESTIGATOR

•  
JOHN CASTERDALE  
ANIMATION

**7/91 - 7/92****10/87 – 5/89****Program Manager****ESL Inc. – Sunnyvale, California**

Participated in engineering programs in the following areas:

- Remote Sensing
- Advanced Computer Technology
- Communications
- Digital Image Processing

**6/89 - 7/91****Program Manager****GTE Government Systems - Mountain View, California**

Participated in engineering programs in the following areas:

- Artificial intelligence
- Geographic Information Systems
- Communications
- Systems Engineering

**12/81 to  
Present****U.S. Army Corps of Engineers - Rank of Major****Military experience includes the following areas:**

- Military Construction
- Terrain Analysis
- Geodetic Surveying
- Photogrammetry

**Education:**

M.S. - Electrical Engineering; University of Santa Clara, CA. 1991

B.S. - Geophysical Engineering; Colorado School of Mines, Golden, CO. 1983

U.S. Army Command and General Staff Officer Course

U.S. Army Combined Arms Staff Support School

U.S. Army Corps of Engineers Officer Advanced &amp; Basic Courses

Defense Mapping Agency, Mapping, Charting &amp; Geodesy Officer Course

**Professional Organizations:**

National Society of Professional Engineers

Society of American Military Engineers

IEEE - Engineering in Medicine and Biology Society, Remote Sensing Society

Society of Automotive Engineers

Southwest Association of Technical Accident Investigators

Association for the Advancement of Automotive Medicine



John J. Smith  
1880 East 84<sup>th</sup> Avenue



**Continuing Education**

- 1992 Stapp Car Crash Conference
- 1993 SAE Conference
- 1993 21st International Workshop on Human Subjects for Biomechanical Research
- 1993 Child Occupant Protection Symposium
- 1993 Stapp Car Crash Conference
- 1993 Head & Neck Injury Symposium (SAE)
- 1994 SAE Conference
- 1994 Rear Impact Symposium (SAE)
- 1994 22nd International Workshop on Human Subjects for Biomechanical Research
- 1994 Stapp Car Crash Conference
- 1995 SAE Conference
- 1995 23rd International Workshop on Human Subjects for Biomechanical Research
- 1995 Stapp Car Crash Conference
- 1995 Accidental Injury: Biomechanics & Prevention, University of California, San Diego, Office of Continuing Medical Education
- 1996 SAE Conference
- 1996 Biomechanics of Accidents, Texas A&M University System
- 1996 AIP Crash Tests
- 1996 AAAM Conference
- 1996 24th International Workshop on Human Subjects for Biomechanical Research
- 1996 Stapp Car Crash Conference
- 1996 Impact Head Injury; Responses, Mechanisms, Tolerance, Treatment & Countermeasures (NATO)
- 1997 SAE Conference
- 1997 Airbag Design and Performance TOPTEC (SAE)

John J. Smith  
1880 East 84<sup>th</sup> Avenue



- 1997 Perception-Reaction-Conspicuity Seminar, University of Iowa
- 1997 AAAM Conference
- 1997 Child Occupant Protection Second Symposium
- 1997 Stapp Car Crash Conference
- 1997 25th International Workshop on Human Subjects for Biomechanical Research
- 1998 SAE Conference
- 1998 Photogrammetry in Accident Reconstruction
- 1998 AAAM Conference
- 1998 25th International Workshop on Human Subjects for Biomechanical Research
- 1998 Stapp Car Crash Conference
- 1998 Whiplash Symposium
- 1999 SAE Conference
- 1999 Current Issues in Using Crash Injury Data
- 1999 26th International Workshop on Human Subjects for Biomechanical Research
- 1999 Stapp Car Crash Conference
- 1999 3<sup>rd</sup> Annual Crash Injury Research & Engineering Network Conference

John J. Smith  
1880 East 84<sup>th</sup> Avenue



#### Articles

The Physics, Biomechanics and Statistics of Rear Impacts, 1993

Damage Only Doesn't Work - Minor Damage Doesn't Mean No injury,  
1997

Analysis of 72 Real World Rear Impacts, 1999

John J. Smith  
1880 East 84<sup>th</sup> Avenue



**Speeches**

Advanced Accident Investigation and Reconstruction (No date)

The Physics of Head Injuries, March 10, 1995 \*

Biomechanics, February 2, 1996

Biomechanics and Accident Reconstruction, UNK, 1996

Principles of Accident Investigation and Reconstruction, September 1996 \*

Seat Belts, Facts and Fiction, August 1997 \*

Misapplication of Accident Reconstruction Data, August 1997 \*

Accident Investigation and Reconstruction; Sources of Data, Common Errors, 1997 \*

Accident Investigation and Reconstruction, March 5, 1998 \*

Understanding Injury Causation in Motor Vehicle Collisions: Physics, Thresholds and Databases, March 6, 1998 \*

Principles of Accident Reconstruction: Physics and Biomechanics, May 14, 1998 \*

Countering the Opposition's Biomechanical Expert, June 15, 1998 \*

\* Included Biomechanics

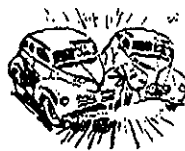
S Date	Name	Court	Case #	Ray Smith	John Smith
	Mendez			Y	
	Daly	Arbit		Y	
	Price	Denver	Unk	Y	
	Stepp	Denver	90CV11773	Y	
	Garcia		Hearing	Y	
	Morgan	Traffic	UNK	Y	
	Ettinger	Jeffco	91CV3449	Y	
	Ayres	Denver	90CV8735	Y	
	Wheeler	Unk	UNK	Y	
	State Farm	Arapahoe	91C766	Y	
	De Herrera	Denver	Arbit	Y	
	Somers	Arapahoe	91CV1284	Y	
	Dick	Boulder	91CV1915	Y	Y
	Austin	Larimer	90CV339-3	Y	
	Garris	C&C Denver		Y	
	Gomez	Huerfano	92CR48	Y	
	Anderson	Jeffco	91T9806	Y	
	Vine		UNK	Y	
	Hjelm	Denver	92CV5058	Y	Y
	Novak	Denver		Y	
	Corder	City	UNK	Y	
	Murr	Infraction	91R4016	Y	
	Lopez			Y	
	Ybara	Denver	92CV3329	Y	Y
	Queen	El Paso	90CV6212	Y	
	Frieman	Glendale	Unk	Y	
	Lucero	Denver	Unk	Y	
	Mileto	El Paso	Unk	Y	
	Oneall	El Paso	91CV1052	Y	Y
	Kruse			Y	Y
	Curry	Referee	Unk	Y	
	James			Y	
	Aguilar	Pueblo		Y	Y
	Pacheco			Y	
	McClendon	Arbit			Y
	Marks	Denver		Y	Y
	Rodriguez			Y	
	Bartholomew	Boulder		Y	
	Tompkins	El Paso		Y	
	Kranisky	Jeffco	91CV2455	Y	
	Dyer	Jeffco	91CV4216	Y	
	Hasenwinkle	Unk	Unk	Y	
	Provorse	Denver		Y	Y
	McGarraugh	Arapahoe	92CV3090	Y	Y
	Martinez	DEN	92V6464		Y
	Kjolrd	El Paso	91CV3135	Y	Y
	Riendaus	Summitt	92CV161	Y	
	Montoya			Y	Y

S Date	Name	Court	Case #	Ray Smith	John Smith
	Mazzara	Adams	92CV1047	Y	Y
	Dearing	El Paso	92CV2511		Y
	Edwards	Denver	92CV6942		Y
	King	Jeffco	93CVUNK		Y
	Eagen	Jefferson	92F2245	Y	
	Dinkle	Larimer	93CV797		Y
	Singleton	Arbit	93CV104		Y
	Robinson	Larimer	92CV986		Y
3/13/97	Leach	El Paso			Y
	Morris	Jefferson	93CV0543	Y	
	Knott	Jefferson	UNKNOWN	Y	Y
	Whittaker	Denver	93CV1100	Y	Y
	Martinez	Denver	93CV6360	Y	
	Nguyen	Denver	93CV873		Y
	Boyne	Denver	93CV2812		Y
	Skoglund	Adams	93CV0510	Y	
	Carpenter	La Plata	93CV142	Y	
9/7/95	Bunce	Jefferson	94CV1688	Y	
	Lemonidis	Denver	92C7940		Y
	Telling	El Paso	93CV0168		Y
	Nagy	Adams	93CV83		Y
	Philibosian	Denver	94CV745	Y	Y
10/29/96	Groove	Arapahoe	94CV1318		Y
	Elderkin	Arbit	93CV488	Y	
	White	El Paso	UNK		Y
	Wullschleger	Denver	93CV6838		Y
	Jason	Denver	UNK	Y	Y
	Wilson	Jefferson	93CV1726		Y
7/8/96	Kramer	Jefferson	95CV0893		Y
	Ortega	Denver	UNK	Y	
1/8/96	Ulman	Denver	93CV5731	Y	
	Tuma	La Plata	93CV80	Y	Y
	Demidovitch	El Paso	UNK	Y	Y
	Sherman	El Paso	93CV1481	Y	
	Saffiedine	Arbit	UNK		Y
	Garth	Denver	93CV5547	Y	Y
10/3/95	Gates	US District	94C1873	Y	
6/18/96	Mulligan	Denver	93CV6417		Y
	Reissinger	Boulder	93CV702		Y
4/26/96	Chapman	Denver	95CV2047	Y	
	Kramer	Morgan			Y
	Benson	Arbit			Y
	Truesdale	Adams	93CV5546		Y
8/31/95	Fox	El Paso		Y	
4/24/96	McKnight	Douglas	94T1080		Y
	Huizar	Arbit	Unk		Y
5/22/95					
3/5/96	Dettman	Denver	94CV3915		Y

\$ Date	Name	Court	Case #	Ray Smith	John Smith
	Kim	Denver	Unk		Y
8/4/95	Reynolds	Denver	94CV5094	Y	Y
12/20/95	Roberts	Denver	95CV772		Y
3/10/95	Conant	Broomfield	Unk	Y	
4/28/1997					
5/13/98					
5/18/98	Abeyta	Denver	95K1723	Y	Y
5/20/98	Hill	Arapahoe	94 CV 1379		Y
10/12/95					
11/27/95	Lynch	Arapahoe	94CV1209	Y	
5/18/95	Lesser	Jefferson	93CV1581		
7/19/96	Gonzales				Y
5/30/95	Martinez	Adams	94CV973	Y	
5/28/96					
5/30/96	Valencia	La Plata	94CV307	Y	Y
8/2/95	Esquibel	El Paso	93CV2135		Y
8/31/95	Barrett	Mesa	94CV321		Y
7/6/95	Parker	Denver	94CV5321	Y	Y
7/25/97					
8/26/97	Hammonds	El Paso	96CV1324	Y	Y
1/30/96	Lilley	Jeffco	95T6309		Y
6/23/95	Pappas	Adams	Unk		Y
1/2/94	Smith	Palmer Lake	UNK		Y
7/6/95	Thomas	Arbitration	Arbitration		Y
2/22/96	Walukewicz	Denver	Unk		Y
11/15/95					
12/18/95	Tanner	Adams	95CV105		Y
8/22/95	Fogg	El Paso	90CV6422	Y	
2/11/97					
4/22/97	Dewhurst	Freemont	95CV25	Y	
1/24/97	Guerrero	Denver		Y	
10/12/95					
2/12/96	Hix	Adams	93CV126		Y
11/3/95	Menter	Littleton	Unk	Y	
4/24/96	Moran	Arbit			Y
3/22/96	Rodrigues	Pueblo	95CV407		Y
2/21/97	Angel	El Paso			Y
4/15/97	Sherman	Denver	96CV1222	Y	Y
8/2/95	Hernandez	El Paso	Arbitration		Y
1/9/1996					
1/30/1996	Simantob	Denver	94CV3279		Y
4/8/96	Martindale	Jeffco	95CV0822		Y
11/5/97	Wright	Jeffco	97CV1309		Y
8/11-13/97	Rhodes	Arbit		Y	Y
6/25/96					
7/1/96	Middleton	El Paso	95CV1060	Y	Y
2/17/97	Delancey	Arbit			Y
4/25/96	Glick	Arbit		Y	

\$ Date	Name	Court	Case #	Ray Smith	John Smith
7/8/96					
8/20/96	Franklin	Mesa	94CV215		Y
4/9/96	Norwood	El Paso			Y
5/2/96	Thompson	Arapahoe	95T4948	Y	
11/15/96					
1/7/97	Williams	Larimer	95CV724		Y
7/25/96	Williams	Arapahoe	95CV1877		Y
11/21/96					
12/2/96	Castle	El Paso	94CV0139		Y
12/17/96					
4/2/97	Cortinez	Adams			Y
2/5/97	Gaudy	Arbit			Y
11/5/96	Moberg	North Dakota	UNK		Y
7/20/97	Collins		96CV1627		Y
1/27/97	Moldenhauer	Douglas	95CV196		Y
1/3/97					
6/10/97	Bennett	Larimer	96CV46		Y
5/13/97					
7/14/97	Bonilla	Denver	96CV5041		Y
2/19/97	Lucero	Denver	96CV3087		Y
3/16/99				Y	
3/17/99	Youngren	Pueblo	97CR89-D		Y
6/16/97	Coxey	Arapahoe	96CV703		Y
10/7/97	Armijo	Arbit			Y
6/25/97	Ramos	Nevada	D05097	Y	Y
	Grossette	Denver	98CV1771	Y	Y
10/16/98	Grossette				Y
9/8/97	Amartey			Y	Y
8/1/97	Friday	Texas	19-97		Y
8/5/98	Smeija	Arapahoe	97CV475		Y
10/22/97					
12/11/97	O'Connor	Boulder	96CV995		Y
10/17/97					
1/5/98	Copley	Boulder	96CV588		Y
10/28/97	Noseworthy	El Paso	94CV2249		Y
	Giannotto	New Jersey			Y
8/7/98					
8/11/98	Faulds X2	Durango	Arbitration	Y	Y
9/11/97					
9/23/97	Garza	Young	26742		Y
2/19/98	Rosenthal	El Paso	96CV0726		Y
11/17/97	Stephenson	Larimer	97CV170		Y
11/20/97					
12/5/97					
12/27/97					
12/28/97	Martin	Arapahoe	93CV2722	Y	Y
2/3/1998					
4/14/98	Marcotte	Adams	97CV0536	Y	





## Raymond P. Smith & Associates

TECHNICAL ACCIDENT INVESTIGATION • ACCIDENT RECONSTRUCTION

MEMBER **SAE** The Engineering Society for Advancing Mobility

RAYMOND P. SMITH  
ACCIDENT  
RECONSTRUCTIONIST

JOHN J. SMITH, PE.  
B.S.G.P. M.S.E.E.

PETER ALEXANDER  
Ph.D., PHYSICS

C. SAMEUL MILLER  
Ph.D., PE

DONALD S. MASSEY  
D.O., FACOEP

THOMAS LINDQUIST  
LAMPS ON/OFF  
RETIRED CPT., C.S.P.

THERESA A. SMITH, M.B.A.  
B.S.N.

FRANCIS J. SMITH  
B.S.G.P. M.S.E.E.

IRIS T. ALEXANDER  
B.S., M.S., PHYSIOLOGY

RALPH D. GRAHAM  
SAFETY CONSULTANT  
TRANSPORTATION

JONATHAN SHARP  
CERTIFIED  
SAFETY PROFESSIONAL

JAMES T. HOGAN  
INVESTIGATOR

RUDOLPH RIEHL  
MECHANICAL  
TECHNICIAN

ROBIN ALEXANDER  
RESEARCH ASSISTANT

BILL OLIVER  
FIELD INVESTIGATOR

JOHN CASTERDALE  
ANIMATION

### Raymond P. Smith & Associates - Rate Structure

January 1, 2000

The following is the rate structure for Raymond P. Smith and Associates effective January 1, 2000. We anticipate that this rate structure will remain constant through July 1, 2000, however, rates are subject to change without notice. Rush jobs may incur additional costs. Expenses will be added to the listed rates. (Testimony rates may vary.)

Technical Accident Investigation *	\$175/Hr
Accident Reconstruction *	\$175 – 225/Hr
Medical Analysis – Doctor	\$300/Hr
Medical Analysis – RN	\$75/Hr
Commercial Vehicle Investigator	\$150/Hr
Metallurgical Expert	\$145/Hr
Seat Belt Expert (Failure Analysis)	\$135/Hr
Engineering Assistant	\$75/Hr
Vehicle Mechanical Inspection	\$55/Hr
Private Investigator	\$55/Hr
Arson Investigator	\$55/Hr
Other Experts	TBD
Expenses	TBD
5 Business Day Turnaround	20% Additional
* Out of State Maximum Daily Rate	\$1,500/day

S Date	Name	Court	Case #	Ray Smith	John Smith
12/12/97	Vangelas	Larimer	96CV745		Y
2/9/98	Smart	Arbit			Y
3/2/98	Davis	Adams	97CV638		Y
12/3/98	Rutherford	Washoe, NV	CV93-02404 CV94-00009		Y
5/7/98					
5/12/98	Duffy	Denver	97CV353		Y
3/13/98	Mooreland	Nacogdoches	13-446-97-6		Y
5/5/98	Mendez	Adams	97 CV 814 C		Y
4/28/98	Gregerson	Arapahoe			Y
2/18/98					
3/10/98	Espinosa	Denver	97CV1503		Y
5/1/98					
6/25/98	McCallum	Boulder	97CV599		Y
6/28/98	Pomerlau	Ft. Carson			Y
3/13/98	Kennington	Smith	97-733-B		Y
2/13/98	Simmons	Van Zandt	97-00411		Y
9/14/1998					
10/1/98	Broussard	Texas	B-148,681		Y
4/21/98	Ortolf	Wyoming			Y
6/8/98	Vigil	Wyoming	147-399		Y
6/5/98	Wright	Texas	97-240		Y
7/14/98	Luebbers	Arapahoe	97CV1373		Y
6/18/98	Chan	Denver	97CV1903		Y
7/21/98	Patin	Texas	B 960,314		Y
6/30/98	Cook	Texas	97-CV-246		Y
8/20/1998					
9/11/98	Wiggins	Texas	A-970, 112-C		Y
8/17/98	Brown	Adams	97CV2349		Y
8/13/98	Brickmont	Denver	96CV6527		Y
7/20/98	Kelley	Wyoming	CV97-0070		Y
10/16/98	Adams	Washoe County, NV	CV 96-03181		Y
2/24/99	Kuhlman	Summit	98 CV 124 R	Y	
1/11/99	Jurad	Reno, NV	CV95-00144		Y
12/7/98	Massey	Dallas, Texas	97-05912-M		Y
1/25/99	Baker	Texas	97-1005-B		Y
10/12/98	McJunkins	Denver	97-CV-5741		Y
10/23/98	Herrington	Texas	D-156,075		Y
10/23/1998		Travis County, TX			
11/9/98	Morell		227,520		Y
1/22/99	Poe				Y
1/6/1999					
2/23/99	Offen	Denver	96 CV 6466	Y	
10/23/98	Rider	Harrison County, TX	97-4223-CCL		Y
2/5/99	Trexler	El Paso	98 CV 1282		Y

Date	Name	Court	Case #	Ray Smith	John Smith
2/5/99	Trexler	El Paso	98 CV 1282		Y
1/8/1999					
1/26/99	Powell	Boulder	97 CV 1819		Y
2/11/99	O'Rourke	Wyoming	98 CV 1029D		Y
1/5/99	Washington	El Paso	96 CV 2440		Y
3/22/99	Robra	Jefferson	98CV1745		Y
3/31/99	Frasler	Texas	97-01254-E		Y
4/6/99	Crockett				Y
4/21/99	Session	Texas	1998-238		Y
4/8/99	Medina				Y
4/5/99	Reyes	Larimer	98-CV-215-1		Y
5/4/99	Stephenson	Arkansas	CIV 96-171		Y
4/29/99	Doman	Adams		Y	
3/25/99	Sudberry	Denver	98 CV 4494	Y	Y
3/17/99	Youngren			Y	
5/10/99	Nowell	Scurry County, TX	20045		Y
5/17/99	Mills	Teller County	95 CV 102		Y
5/20/99	Frederick	Charlotte County, FL	97-543-CA		Y
6/9/1999			98 CV 3862		
6/14/99	Ferris	Arapahoe	Div 4		Y
6/24/1999					
7/28/99					
12/9/99	Hardee	New Jersey	L-6101-97		Y
8/5/99	Knight	Dallas, Texas	DV98-08087		Y
9/8/99	Cordova	El Paso	96CV0790	Y	Y
9/14/1999					
9/29/99	Woolery	El Paso	97CV1213		Y
10/6/99	VanGalen	Jefferson	98CV2768		Y
10/14/99	Fleck	Denver	98-CV-3692-3		Y
11/3/99	Barnes	Adams	98-CV-3225		Y
11/4/99	Briones	Arapahoe	98-CV-2099		Y
11/5/1999					
02/23/00	Martinez, Gofma	Wyoming	76482-A, 76500	Y	Y
11/30/99	Nickerson	Summit	98 CV 289	Y	
1/15/00	Bonine	Mesa County	98 CV 560		Y
4/18/00	Jones	Adams	99 CV 951		Y
	Grossette			Y	
5/16/00	Smith	Arapahoe	98 CV 1499	Y	